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March 8, 1993

Eric D. Goller
Operable Unit Manager
U.S. Department of Energy
P.O. Box 550, A5-19
Richland, Washington 99352



Re: Description of Work for 100 B/C Area Test Pits Response

Dear Mr. Goller:

-27476

The U.S. Environmental Protection Agency (EPA) has reviewed the Description of Work (DOW) for the 100 B/C Area Test Pits. The DOW was sent to EPA by the Westinghouse Hanford Company (WHC) on February 23, 1993. In the transmittal letter WHC requested comments by March 5, 1993.

As stated in the HLAN message sent to you on March 1, 1993, EPA finds the DOW to be lacking the necessary details to determine why the work is being proposed. It is not apparent what questions are expected to be answered by completing the proposed work. Is the purpose of this DOW to answer questions for the large scale engineering project being proposed for the B/C Area, or is the work being proposed to answer characterization questions on the burial grounds? The DOW should be explicit on why the work is being performed.

The EPA believes that with proper planning and involvement by all three parties a test plan/DOW can be developed that will answer questions to support large scale engineering, support information needs for the disposal facility being proposed for the 200 Area, including treatment options, and answer characterization and remedial design questions regarding the burial grounds in the 100 Area.

The EPA is concerned that if this work is performed as specified in the DOW it will provide little useful information. The EPA further believes that performing this activity would not be a good use of environmental restoration funding. The EPA requests that no intrusive field work be performed in the B/C Area until such time that all three parties can agree on the scope of work for this activity.

The EPA requests that a meeting be held soon to discuss these issues and begin dialogue on the appropriate scope of work to begin answering the questions that are before us. Please contact me at (509) 376-8631 if you have any questions.

Sincerely,

Dennis Faulk

Operable Unit Manager

cc: Mel Adams, WHC
Becky Austin, WHC
Julie Erickson, DOE
George Hofer, EPA
Dave Jansen, Ecology
Darci Teel, Ecology
Ted Wooley, Ecology
Steve Wisness, DOE

Administrative Record (100-BC-1 and 100-BC-2 Operable Units)